

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 17-70
)	
JEFFREY ALLEN BURGESS)	

POSITION OF DEFENDANT
WITH RESPECT TO SENTENCING FACTORS

NOW COMES, the Defendant, Mr. Jeffrey Allen Burgess, through his counsel, Assistant Federal Defender Andrew Lipson, respectfully filing this position with respect to sentencing factors pursuant to Fed. R. Crim. P. 32(f), Local Rule 32(c)(4), and U.S.S.G. § 6A1.2. In support thereof, counsel states:

1. Undersigned counsel and Mr. Burgess have reviewed the Presentence Investigation Report ("PSR").
2. Undersigned counsel has conferred with Assistant United States Attorney Cindy K. Chung and United States Probation Officer Erin Stewart about the PSR and its contents.
3. Mr. Burgess has no objections, additions, or corrections to the contents of the PSR.

4. Undersigned counsel reserves the right to file a Sentencing Memorandum prior to the sentencing hearing regarding all the factual and legal issues pertinent to this case.

Respectfully submitted,

s/ Andrew Lipson_____

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